

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

## **JOINT INITIAL STATUS REPORT**

Pursuant to Local Rule 116.5(a), the parties hereby file this status report in connection with the initial status conference that is scheduled for January 9, 2025. The parties jointly and respectfully request that this status report be considered in lieu of that status conference. The parties further request that the Court schedule an interim status conference in approximately 45 days to permit additional time to review discovery and discuss a potential resolution.

### **(1) Automatic Discovery & Pending Discovery Requests**

The government produced automatic discovery on November 18, 2024 and supplemental discovery on January 3, 2024, along with an index of the materials produced. The government does not presently anticipate additional automatic discovery. No discovery requests are pending.

The government is aware of its obligations to produce materials under Fed. R. Crim. P. 16, Local Rule 116.2(b)(1), and *Brady vs. Maryland*. To the extent any additional discovery—including *Brady* material—becomes available, the Government will promptly produce it.

**(2) Additional Discovery Requests and Pretrial Motions**

The Defendant is reviewing the discovery provided by the government. The parties will report on the status of any additional discovery requests or anticipated motions under Fed. R. Crim. P. 12(b) in an interim or final status report.

**(3) Protective Orders**

Neither party presently anticipates seeking a protective order in this case.

**(4) Expert Discovery**

The government agrees to provide any expert witness disclosures 30 days prior to trial.

The Defendant agrees to provide any expert witness disclosures 21 days prior to trial.

**(5) Speedy Trial Act**

All of the time has been excluded between the Defendant's initial appearance and arraignment on October 21, 2024 through the date of the initial status conference on January 9, 2025 (Dkt. 15). The parties request that the Court exclude the period of time from January 9 until the next status conference under 18 U.S.C. § 3161(h)(7)(A) because the ends of justice served by this exclusion—namely, additional time to review discovery and discuss a potential resolution—outweigh the interests of the public and the Defendant in a speedy trial.

**(6) Interim Status Conference**

The parties respectfully request that the Court schedule an interim status conference to occur in approximately 45 days from the initial status conference, or as soon thereafter as is convenient for the Court.

Respectfully submitted,

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**Certificate of Service**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: January 6, 2025

/s/ *David M. Holcomb*  
Assistant United States Attorney